## **GIBSON DUNN**

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April 23, 2020

## VIA ECF

The Honorable Kiyo Matsumoto United States District Judge United States District Court for the Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Greebel, S1 15 Cr. 637 (E.D.N.Y.) (KAM)

Dear Judge Matsumoto:

We write to respectfully request, with the consent of the Government, an extension to May 27, 2020 of the current April 27, 2020 deadline for Mr. Greebel to respond to the Writs of Continuing Garnishment issued by the Court. As stated in our letter dated February 27, 2020, we provided the Assistant U.S. Attorney handling this matter, Thomas Price, a number of cases and documents for his consideration of the issues, and in hopes of reaching an agreement to avoid a dispute and any further litigation. We have since engaged in negotiations with Mr. Price and, per the Government's request, have sought relevant documents from Mr. Greebel's former employers. However, due in part to the COVID-19 pandemic, we have not yet concluded our negotiations. Should we continue our discussions and need additional time to reach a resolution, we will write to Court in advance of May 27.

Respectfully submitted,

/s/ Reed Brodsky

Reed Brodsky

cc: All Counsel of Record (Via ECF)